

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

STANDARD CHARTERED FINANCIAL
SERVICES (LUXEMBOURG) S.A. (f/k/a
AMERICAN EXPRESS FINANCIAL
SERVICES (LUXEMBOURG) S.A. and f/k/a
AMERICAN EXPRESS BANK
(LUXEMBOURG) S.A.), as represented by its
Liquidator HANSPETER KRÄMER,
HANSPETER KRÄMER, in his capacities as
liquidator and representative of STANDARD
CHARTERED FINANCIAL SERVICES
(LUXEMBOURG) S.A., STANDARD
CHARTERED BANK INTERNATIONAL

Bankruptcy Court Adv. Pro.
No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Bankruptcy Court
Adv. Pro. No. 12-01565 (CGM)

(AMERICAS) LTD., f/k/a AMERICAN EXPRESS BANK INTERNATIONAL, and STANDARD CHARTERED HOLDINGS INC. (as successor in interest to STANDARD CHARTERED INTERNATIONAL (USA) LTD., f/k/a AMERICAN EXPRESS BANK LTD.),

Defendants.

NOTICE OF MOTION

Defendants Standard Chartered Financial Services (Luxembourg) S.A.; Standard Chartered Bank International (Americas) Ltd.; and Standard Chartered Holdings Inc. (as successor in interest to Standard Chartered International (USA) Ltd.) (collectively, the “SCB Defendants”) hereby provide notice in accordance with Local Bankruptcy Rule 8010-1 that the SCB Defendants have filed with the clerk of this Court for transmittal to the United States District Court for the Southern District of New York a motion pursuant to 28 U.S.C. § 158(a)(3) and Federal Rule of Bankruptcy Procedure 8004 for leave to appeal this Court’s Order entered on January 18, 2023, Adv. Pro. No. 12-01565 (CGM) (Bankr. S.D.N.Y.), ECF No. 173, denying the SCB Defendants’ motion to dismiss the Amended Complaint of plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff.

Dated: February 1, 2023
New York, New York

Respectfully Submitted,

/s/ Andrew J. Finn

Andrew J. Finn

Mark A. Makar

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Financial Services (Luxembourg)

S.A.; Standard Chartered Bank

International (Americas) Ltd.; and

Standard Chartered Holdings Inc. (as

successor in interest to Standard

Chartered International (USA) Ltd.)